

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF OKLAHOMA

RANDY LUNDY,)	
)	
Plaintiff,)	
)	
v.)	Case No: 5:22-cv-00699-F
)	
HL MOTOR GROUP, INC., et al.,)	
)	
Defendants.)	
)	Consolidated for Discovery With
FARMERS MUTUAL FIRE INSURANCE)	
COMPANY OF OKARCHÉ,)	
)	
Plaintiff,)	
)	
v.)	Case No: 5:22-cv-00752-D
)	
HL MOTOR GROUP, INC., et al.,)	
)	
Defendants.)	

DEFENDANTS' TRIAL WITNESS LIST

Defendants, HL Motor Group, Inc. (“Highlight”) and Ognjen Milanovic (“Mr. Milanovic”), by their attorneys, Lewis Brisbois Bisgaard & Smith LLP, may call the following witnesses who will offer testimony on their behalf at trial:

Joseph Borza, R.N., Oklahoma University Medical Center, 700 N.E. 13th, Oklahoma City, OK 73104.

Nurse Borza is expected to have knowledge of and will testify as to Mr. Milanovic’s condition, statements and medical treatment on August 8, 2020. Disclosing further, see documents previously produced and identified as Farmers Mutual 0477 - 0513, 0522 - 0546 for a complete statement of all opinions that he will express and the basis and reasons for them.

David J. Fletcher, MD MPH, SafeWorks Illinois Occupational Health Services, Ltd., 1806 North Market, Champaign, Illinois 61822.

Dr. Fletcher is the Medical Director and CEO of SafeWorks Illinois, a private occupational medicine practice located in Champaign, Illinois. Dr. Fletcher is board-certified in occupational and preventive medicine and has served as an expert witness in trucking related litigation on behalf of plaintiffs and defendants. Dr. Fletcher is expected to have knowledge of and will testify as to his: review of Mr. Milanovic's medical records on or about August 8, 2020; opinion that Mr. Milanovic lost consciousness due to a sudden medical emergency immediately prior to the August 8, 2020 motor vehicle accident which is the subject of Plaintiffs' Complaints; and, opinion that, prior to August 8, 2020, Mr. Milanovic was fit to operate a commercial motor vehicle. Disclosing further, see documents previously produced and identified as Highlight 000476 - 000496 for a complete statement of all opinions the witness will express and the basis and reasons for them.

Austin Green, Paramedic, EMSA-Western Division, 1111 Classen Drive, Oklahoma City, OK 73103.

Paramedic Green is expected to have knowledge of and will testify as to Mr. Milanovic's condition, statements and medical treatment on August 8, 2020. Disclosing further, see documents previously produced and identified as Farmers Mutual 0514 - 0521 for a complete statement of all opinions that he will express and the basis and reasons for them.

Trooper Wayne Linzy, Badge No. 649, Oklahoma Highway Patrol.

Trooper Linzy is expected to have knowledge of and will testify as to the August 8, 2020 motor vehicle accident which is the subject of the Plaintiffs' Complaints. He is also expected to have knowledge of and testify as to his recollection and impressions of Mr. Milanovic's statements made and physical condition immediately after said motor vehicle accident. Disclosing further, see documents previously produced and identified as Highlight 000182 - 000187 for a complete statement of all opinions that he will express and the basis and reasons for them.

Dakota Meadows, Paramedic, EMSA-Western Division, 1111 Classen Drive, Oklahoma City, OK 73103.

Paramedic Meadows is expected to have knowledge of and will testify as to Mr. Milanovic's condition, statements and medical treatment on August 8, 2020. Disclosing further, see documents previously produced and identified as Farmers Mutual 0514 - 0521 for a complete statement of all opinions that she will express and the basis and reasons for them.

Ognjen Milanovic, 3-3 Four Winds Drive, North York, Ontario M3J 1K7.

Mr. Milanovic is expected to have knowledge of and will testify as to the August 8, 2020 motor vehicle accident which is the subject of the Plaintiffs' Complaints. He is also expected to have knowledge of and testify as to his experiencing a sudden loss of consciousness immediately prior to said motor vehicle accident.

Maria Perez, M.D., Oklahoma University Medical Center, 700 N.E. 13th, Oklahoma City, OK 73104.

Dr. Perez is expected to have knowledge of and will testify as to Mr. Milanovic's condition, statements and medical treatment on August 8, 2020. Disclosing further, see documents previously produced and identified as Farmers Mutual 0477 - 0513, 0522 - 0546 for a complete statement of all opinions that she will express and the basis and reasons for them.

Giselle Zagari Stuppiello, M.D., Oklahoma University Medical Center, 700 N.E. 13th, Oklahoma City, OK 73104.

Dr. Zagari Stuppiello is expected to have knowledge of and will testify as to Mr. Milanovic's condition, statements and medical treatment on August 8, 2020. Disclosing further, see documents previously produced and identified as Farmers Mutual 0477 - 0513, 0522 - 0546 for a complete statement of all opinions that she will express and the basis and reasons for them.

A. Webster, R.N., Oklahoma University Medical Center, 700 N.E. 13th, Oklahoma City, OK 73104.

Nurse Webster is expected to have knowledge of and will testify as to Mr. Milanovic's condition, statements and medical treatment on August 8, 2020. Disclosing further, see documents previously produced and identified as Farmers Mutual 0477 - 0513, 0522 - 0546 for a complete statement of all opinions that she will express and the basis and reasons for them.

Respectfully submitted,

HL Motor Group, Inc. and Ognjen Milanovic,

By: /s/ Michael T. Franz

One of Defendants' Attorneys

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Date: August 15, 2023

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